

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

R.S. LOGISTICAL SOLUTIONS LTD,

Plaintiff,

v.

Case No. 3:21-CV-178

**JANUS GLOBAL OPERATIONS, LLC,
and
CALIBURN INTERNATIONAL, LLC,**

Defendants.

JURY TRIAL DEMANDED

MOTION FOR LEAVE TO FILE NOTICE OF CONFERENCE

Come the Defendants, Janus Global Operations, LLC, ("JGO") and Caliburn International, LLC, ("Caliburn"), by and through undersigned counsel, and move this Honorable Court for leave to file a Notice of Conference pursuant to this Court's Order from May 12, 2021, regarding Motions to Dismiss pursuant to Fed. R. Civ. P. 12(b). By oversight, undersigned counsel did not meet and confer with plaintiff's counsel before filing the Motion to Dismiss for Failure to State a Claim Upon Which Relief Can Be Granted. However, in an attempt to cure this defect, undersigned counsel has subsequently met and conferred with plaintiff's counsel. The Defendants respectfully request that the Court grant leave to file the attached Notice to cure the defect and rule on Defendant's motion on its merits.

Respectfully submitted this 23rd Day of July 2021.

By: **JANUS GLOBAL OPERATIONS, LLC, AND
CALIBURN INTERNATIONAL, LLC, DEFENDANTS**

/s/ Tasha C. Blakney

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